

COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

KM

JOHN DOE & AL

Plaintiff,

v.

Civil Action No.....

Allassane Dramane Ouattara

3 - 25 CV 1013-X

Dominique Claudine Nouvian Ouattara

Defendants.

ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT

COMPLAINT FOR DAMAGES UNDER THE ALIEN TORT STATUTE, THE TORTURE VICTIM
PROTECTION ACT, AND FOR ACTS OF TERRORISM

Plaintiff, alleges the following against :

Defendant Alassane Dramane Ouattara & Dominique Claudine Nouvian Ouattara

in their individual capacity**JURISDICTION AND VENUE**

This Court has jurisdiction under 28 U.S.C. § 1331 and 28 U.S.C. § 1330 (Alien Tort Statute).

Venue is proper pursuant to 28 U.S.C. § 1391 because Defendant is alleged to reside in or have assets in this district, and acts giving rise to this complaint constitute violations of international law.

PARTIES

Plaintiff are group of citizen of Côte d'Ivoire currently residing in United States.

DEFENDANT Alassane Ouattara is a citizen of Côte d'Ivoire and was Citizen of Burkina Faso

Plaintiff sues Defendant in his individual capacity for violations of international law and for personally participating in or enabling acts of terrorism and gross human rights violations inclinding Genocide , and murder of 3,000 civilians

FACTUAL ALLEGATIONS

During the civil war in Côte d'Ivoire (approximately 2010–2011), forces under the command or control of Defendant committed widespread and systematic acts of violence, including extrajudicial killings, torture, and other gross human rights abuses against civilians.

Defendant was in a position of authority and either ordered, authorized, or failed to prevent such acts, despite having knowledge or reason to know of them.

Plaintiff and Plaintiff's family were direct victims of these acts, including injury, death, and genocide of 3,000 peoples

Defendant exercised effective command and control over these forces and either directly ordered or failed to prevent these acts, despite clear knowledge of their occurrence.

Plaintiff and Plaintiff's family were direct victims of these acts

CAUSES OF ACTION

Count I: Violations of the Law of Nations (Alien Tort Statute)

The acts committed under Defendant's authority constitute terrorism, crimes against humanity, and war crimes in violation of international customary law.

Count II: Torture and Extrajudicial Killing (Torture Victim Protection Act)

Defendants, acting under color of law, is responsible for acts of torture, cruel treatment, and extrajudicial killings committed against civilians, including Plaintiff's family members.

Count III: Acts of International Terrorism

Defendants, and his agents engaged in acts intended to intimidate and terrorize civilian populations for political purposes, constituting international terrorism as defined by customary international law and applicable human rights conventions.

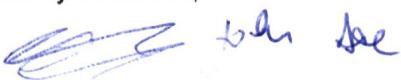
These acts resulted in grave harm to the Plaintiffs , including emotional trauma, loss of family, forced displacement, and physical injury and the death of 3,000 peoples

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Award compensatory and punitive damages in amount of \$3 Billion to victim's family
- B. Declare that Defendant's actions constitute terrorism, torture, and violations of international law;
- C. Block all assets of Ivory Coast and or Mr. Alassane Ouattara and his wife, all assets at the World Bank and any Bank, all assets at Federal Reserve, freez any real estate and their name and any bank account, including coffee funds, cocoa fund and all others
- D. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,


101 EAST PARK #355
RIANO TX 75074